

UNITED STATES DISTRICT COURT
for the
District of Oregon
Portland Division

In the Matter of the Seizure of

**All Crystals, Yard Art, Statues, Decorations,
Storage Containers and Storage supplies, further
described in Attachment A hereto, and currently
in the custody of the Yamhill County Sheriff's
Office**

Case No. 3:25-mc-580

**APPLICATION FOR A WARRANT TO SEIZE PROPERTY SUBJECT TO FORFEITURE
BY TELEPHONE OR RELIABLE ELECTRONIC MEANS**

I, Damian R. Platosh, being duly sworn, do depose and state under penalty of perjury:

I am a Special Agent with the Federal Bureau of Investigation (FBI), and have reason to believe that certain property, namely:

All Crystals, Yard Art, Statues, Decorations, Storage Containers and Storage supplies, further described in Attachment A hereto, and currently in the custody of the Yamhill County Sheriff's Office

is property that constitutes or are derived from proceeds traceable to violations of 18 U.S.C. § 1343 (wire fraud). The property described above, and further described in Attachment A, is therefore subject to seizure pursuant to 18 U.S.C. § 981(b) and 21 U.S.C. § 853(f) and is forfeitable pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461.

The facts to support a finding of probable cause for issuance of a Seizure Warrant are as follows:

SEE ATTACHED AFFIDAVIT, incorporated herein.

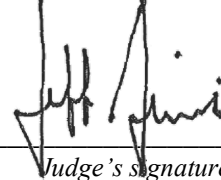
Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at 4:05 p.m.

Date: May 19, 2025.

Portland, Oregon

DAMIAN R. PLATOSH, Special Agent, FBI

Printed name and title



Judge's signature

JEFFREY ARMISTEAD, U.S. Magistrate Judge

Printed name and title

DISTRICT OF OREGON, ss:

AFFIDAVIT OF DAMIAN R. PLATOSH

AFFIDAVIT IN SUPPORT OF APPLICATION FOR SEIZURE WARRANT

I, Damian Platosh, being duly sworn, hereby depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and have been so employed since May 1997. I am currently assigned to the FBI Portland Field Office's White Collar Crime squad. As a federal law enforcement officer, I am authorized to investigate and make arrests for violations of federal law, and to apply for federal search and seizure warrants. As well as being a licensed Certified Public Accountant, I completed a 21-week course of instruction at the FBI Academy in Quantico, Virginia, which consisted of specialized training in investigating a range of criminal violations. I acquired knowledge and information about crimes from many sources, including formal and informal training, other law enforcement officers and investigators, persons who I have interviewed, and my participation in numerous investigations. I have investigated matters involving fraud and embezzlement, particularly as they relate to violations of Title 18 of the United States Code, including Section 1343 involving wire fraud.

2. I submit this affidavit in support of an application for a seizure warrant for items purchased by Cheryl Campos with funds embezzled from the Veterans of Foreign Wars ("VFW") organizations in Portland, Oregon, and Dayton, Oregon. These items were previously seized by the Yamhill County Sheriff's Office ("YCSO") pursuant to a State search warrant, from the residence of Chery Campos in Dayton, Oregon, pursuant to a YCSO investigation into

the embezzlement from the Dayton VFW Post. The items are currently stored in evidence at the YCSO, and are further described in Attachment A, incorporated herein.

3. As set forth below, there is probable cause to believe, and I do believe, that the items described in Attachment A hereto, constitute or are derived from proceeds traceable to violations of 18 U.S.C. § 1343 (wire fraud), and, as such, are subject to seizure pursuant to 18 U.S.C. § 981(b) and 21 U.S.C. § 853(f), and subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

4. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, FBI forensic accountants, interviews of witnesses, a review of records related to this investigation, communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience.

Statement of Probable Cause

5. In the late fall of 2024, I spoke by phone and later met with YCSO Detective Skip Jones. Det. Jones advised he was the lead investigator on a case which was referred to the YCSO by the Dayton Oregon VFW Post ("Dayton VFW") in the summer of 2024. The Dayton VFW, located in Yamhill County, advised that they had terminated Dayton VFW Quartermaster Cheryl Campos, after an external review of the books and records of the Dayton VFW by an independent forensic accountant determined Campos embezzled over \$100,000 from the Dayton VFW. In addition to being the Quartermaster at the Dayton VFW, Campos was also the

Quartermaster of the Department of Oregon VFW (“Oregon VFW”) in Portland, OR. While Campos was a volunteer Quartermaster at the Dayton VFW, she was paid a salary of approximately \$55,000 annually to be the Quartermaster at the Oregon VFW. As the Quartermaster, Campos had signatory authority on all the VFW bank and investment accounts. In that capacity, Campos was responsible for overseeing the VFW’s financial records and reporting, including managing the VFW’s budget, paying the VFW’s bills, and depositing VFW’s income.

6. Det. Jones’ investigation led him to review the Dayton VFW U.S. Bank bank statements as well as the personal U.S. Bank bank statements of Cheryl Campos. The investigation revealed, that between January 2022 and March 2024, there were at least 45 unauthorized bank transfers from the Dayton VFW account to Campos’ personal accounts, totaling over \$162,000. In addition, there appeared to be over 100 additional bank transfers coming into Campos’ U.S. Bank account from the Oregon VFW U.S. Bank account.

7. Det. Jones obtained a search warrant for Cheryl Campos’ Google account associated with the email address cecampos63@gmail.com. A review of the emails determined that Campos made at least 57 purchases from several companies totaling over \$523,000. The majority of these purchases were made from Chinese businesses such as Donghai Kindfull Crystal, Helmsman Crystals, HiHi Fashion Crystals/Huangyi8a@gmail.com, and Lidit Eyelashes. The contents of the emails indicated Campos was purchasing crystals, semi-precious rocks, statues made of crystals and similar items from China.

8. In addition to the crystals, Det., Jones traced funds that were used by Campos to purchase storage containers, aka Conex boxes, to store the aforementioned items. These containers are described as two 40' Long Cube Multi Door Containers and two 8' Long Containers One Trip End Doors One Man Door One Window and Fork Pockets.

9. Det. Jones also traced embezzled VFW funds used by Campos to purchase a 2015 Toyota Tundra ORLP SB75632, VIN: 5TFDY5F18FX431452. This vehicle is currently seized by YSCO and is parked in a storage lot.

10. Det. Jones obtained a State search warrant for the residence of Cheryl Campos in Yamhill County, Oregon. That search warrant was executed on September 4, 2024. The search warrant authorized a search of the residence, the yard, and Campos' vehicle, a Honda CRV. Det. Jones described the yard as being filled with crystals, crystal statues, and similar items. The majority of the items were still in their original packing crates along with their bills of lading indicating they were shipped to Campos in Oregon from China. There items are currently stored at a YCSO storage location in McMinnville, OR. A listing of the items seized by YCSO during the search is included at the end of this affidavit. Pictures of some of the items seized during the search are shown below:









11. Det. Jones advised the Dayton VFW, that based upon his review of Campos' bank accounts, there was evidence that she not only embezzled funds from the Dayton VFW, but also from the Oregon VFW. Oregon VFW conducted an internal investigation and uncovered additional evidence of embezzlement by Campos. As this embezzlement occurred outside of Yamhill County, the VFW contacted the FBI.

12. On October 28, 2024, after meeting with the Oregon VFW, I initiated an investigation into the allegations of Campos embezzling from the Oregon VFW. The Oregon VFW maintained its bank accounts at U.S. Bank, a financial institution as defined in 18 U.S.C. § 20. Campos was an authorized signatory on each of the VFW's accounts at U.S. Bank, and as a result, Campos had access to and control over the VFW's accounts. A review of the bank statements of the Oregon VFW and Campos revealed that Campos initiated and completed at least 186 unauthorized transfers into her U.S. Bank accounts from the Oregon VFW and the Dayton VFW U.S. Bank accounts.

13. The investigation revealed that starting on January 7, 2022 Campos completed her initial unauthorized mobile banking transfer sending \$100 from a Dayton VFW, U.S. Bank account into her personal U.S. Bank checking account. Campos continued making mobile and internet banking transfers, varying in amounts from approximately \$100 to \$100,000, from multiple Oregon VFW and Dayton VFW U.S. Bank accounts into her personal U.S. Bank accounts. The last unauthorized internet banking transfer Campos completed on June 24, 2024, sent \$50,000 from an Oregon VFW U.S. Bank account into her personal U.S. Bank checking account. These intrabank U.S. Bank transfers by wire, going from VFW accounts to Campos' personal banking accounts, involved Campos transmitting or causing the transmission of money

by wires through U.S. Bank servers located in either Kansas or Minnesota. The sum total of these 186 unauthorized transfers was over \$1,786,000.

14. The investigation included determining how Campos spent the over \$1,786,000 in embezzled funds. It revealed that between May 2022 and August 2024, she made over 1,100 individual purchase transactions and spent over \$1,478,640 on various crystals and similar items. In addition, she spent over \$13,000 on Conex boxes to store her purchases, as well as \$43,277 on a Toyota pick-up truck for her son. The sum total of these three categories was approximately \$1,534,900.

15. Campos purchased crystals and similar items from a variety of merchants based in China. She discovered items to purchase by watching videos on Facebook, TikTok, as well as directly from sellers' websites, and paid for them by using her PayPal account which was linked to her U.S. Bank account. Purchases were made from sellers including 东海县舵手水晶制品有限公司 (translated as Donghai County Helmsman Crystal Products Co., Ltd) who operated the website www.helmsmancrystal.com and used multiple emails including susanblee@dhduoshou.com and meimeidhduoshou@sina.com. Campos purchased from 广州拓力帝贸易有限公司 (translated as Guangzhou Tuolidi Trading Co., Ltd) who operated the website <https://www.hihifashion.com> and used multiple emails including hihifashioncrystal@outlook.com and lidit822@gmail.com. She also purchased from a business that used both the name 毅黄 (translated as Yi Huang) as well as 广州映彤贸易有限公司 (translated as Guangzhou Yingtong Trading Co., Ltd) which used the email huangyi8a@gmail.com.

16. In addition to the crystal purchases, on June 7, 2024, Campos purchased a 2015 Toyota Tacoma Truck from Lum's Buick GMC in McMinville, Oregon, for \$43,277. This was purchased by check drawn directly from her personal U.S. Bank checking account which included in the memo line "Truck Danny." The truck is registered by the Oregon DMV to Daniel T. Campos, the son of Cheryl Campos.

17. Campos also purchased a Conex Container on July 26, 2024 from Bucky Box by Check for \$5,350, drawn directly from her First Federal Savings Account; a Conex container from InSimple Box on April 10, 2024, by debit card for \$5,956, from her personal U.S. Bank checking account; and a Conex box on 8/02/2024 from Simple Box Oregon, LLC by Paypal \$1,792. A total of \$13,098 was spent on the Conex boxes used to store her various crystals.

18. On April 15, 2025, Campos plead guilty to a one count Information charging her with a violation of Title 18 U.S.C. § 1343 Wire Fraud. As part of the plea, Campos agreed to forfeit any property, real or personal, which constituted or was derived from proceeds traceable to the violation, including but not limited to a money judgment for a sum of money equal to the amount of property constituting or derived from proceeds traceable to the offenses. The items previously seized by YSCO, as described in Attachment A, were purchased using proceeds of her fraudulent scheme and are therefore subject to forfeiture as stipulated in her plea agreement.

19. Based upon the foregoing and on my training and experience, there is probable cause to believe, and I do believe, that the funds transferred without authorization from the VFW Oregon and VFW Dayton U.S. Bank accounts to Campos' personal U.S. Bank accounts constitute wire fraud in violation of 18 U.S.C. § 1343.

Conclusion

20. Based on the foregoing information, there is probable cause to believe that items listed in Attachment A were purchased with proceeds traceable to violations of the above-mentioned statute and, as such, are subject to seizure pursuant to 18 U.S.C. § 981(b) and 21 U.S.C. § 853(f), and subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

21. This affidavit, the accompanying application, and the requested seizure warrant were reviewed by Assistant United States Attorney (AUSA) Katie de Villiers prior to being submitted to the Court. AUSA de Villiers informed me that in her opinion, the affidavit and application are legally and factually sufficient to establish probable cause to support the issuance of the requested warrant.

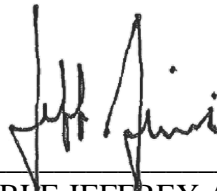
By telephone pursuant to Fed. R. Crim. P. 4.1

DAMIAN R. PLATOSH

Special Agent

Federal Bureau of Investigation

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by
telephone at 4:05 p.m. on May 19, 2025.



HONORABLE JEFFREY ARMISTEAD
United States Magistrate Judge

ATTACHMENT A**Items to be seized**

Purple and Green Crystals found in the Honda CRV

Large Cat Like Statue

Large White Crystal Skull w/ Green Eyes

Blue Tub w/ Misc. Crystal Parts

Multiple Blue and White Horse Parts

Large Blue Statue Holder

Crystal Animal Skull

Large Crystal Skull

One Large and Three Small Black Turtles

Dinosaur Skull

Round Crystal Yard Art

Large Dinosaur Statue

Round Crystal Ball

4 Stones Rock Looking

Cream Crystal Statue w/ Ball

Dinosaur Statue

Christmas Type Tree from Container 7

Black/Purple Egg Shape White Crystal Inside (C7)

Geode Grey Purple Rock Formation (C7)

Geode- Black/Purple crystal/Egg Shape (C7)

Wood Stand/3 Legs Carvings (C7)

Wood Stand Flower Shape/Carvings (C7)

Large Wood Stand, Large Geode Purple Crystal (C7)

Large Geode Black w/Purple Crystals (C7)

White Deer Statue

Large Yard Statue

Lion Statue

Crystal Statue
Large Yard Statue
Crystal Yard Statue
Large Yard Statue
Crystal Rabbit Statue
Large Round Ball Statue
Large Yard Statue
Dragon Yard Statue
Pink Crystal Statue Alien Head
Large Yard Statue
Lion Yard Statue
Medium Yard Statue
Large Black Yard Statue
Ball Yard Art
Large Cream Crystal Statue
Large Yard Statue
Very Large Statue
Round Crystal Yard Art
Crystal Bear Statue
Ball Yard Art
Purple Ball Yard Art
Medium Crystal Yard Art
Large Yard Art
Purple Crystal
Large Crystal Ball
Medium Crystal Ball
Medium Crystal Ball
Medium Crystal Ball
Medium Crystal Ball
Medium Crystal Ball

Medium Crystal Ball
Large Ball
Large Purple Yard Art
Medium Yard Art
Medium Yard Art
Large Yard Art
Large Yard Art
Medium Yard Art
Small Yard Art
Small Yard Art
Pallet of 16 pieces of Yard Art
Small Crystal Yard Art
Pallet of 7 Boxes
Pallet of 4 Boxes
Very Large Ball
Pallet of 5 Totes
Large Yard Art
Large Ball Art
Pallet of 8 pieces of Yard Art
Box of Large Ratchet Straps
Small Crystal Yard Art
Large Yard Art
Purple Crystals
Two Statues Yard Art
Dinosaur
Large Yard Art
Large Yard Art
Black Lift
Brown Bear Statue
Purple Bear Statue

Two Boxes of Crystals Statues

Two Elephants, One Frog, One Hippo, One Chicken, One Ball

One Small Yard Art

One Gray Lizard

One Gray and White Lizard

One Gray Shark Statue

Large Crocodile Statue

Large Sitting Bear Statue

Three Medium Crystal Yard Art Balls

Marble Table (Found in Conex 7)

White Pig Statue

Five Black Totes with Yellow Lids with Crystal Statues

Large Crystal Ball

Medium Crystal Ball

One 8' Shipping Container: "C2"

One 8' Shipping Container: "C3"

One 40' Shipping Container: "C5"

One 40' Shipping Container: "C6"

One 40' Shipping Container: "C7"

Over 50 Totes Containing Misc. Crystal/Wood/Stone Statues

Misc. Crystal Statues from Scene Labeled "Conex 5," and

One 2015 Toyota Tundra Truck, VIN: 5TFDY5F18FX431452, with its tools and appurtenances.